

## **REMARKS**

[0001] Claims 1-3, 6-10, 12-13, 16-19, 29-35, and 37-42 are all the claims pending in the application.

[0002] Applicant respectfully submits that entry of this paper is proper because it will either place the application in condition for allowance or in better form for appeal. Applicant further respectfully submits that no new matter is added to the claims, nor has the scope of the pending claims changed. Accordingly, no new issues are raised that necessitate a further search of art. Applicant respectfully traverses the rejections based on the following discussion and remarks.

### **I. The Prior Art Rejections**

[0003] Claims 1-3, 6-10, 12-13, 16-19, 29-30, 33-35, and 37-40 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,721,734 to Subasic et al., (hereinafter, Subasic). Claims 31-32 and 41-42 are rejected under 35 U.S.C. §103(a) as being obvious over Subasic in view of U.S. Patent No. 6,332,143 to Chase, (hereinafter, Chase). Applicants traverse these rejections based on the following discussion.

[0004] Applicants respectfully submit that Subasic, either alone or in combination with Chase fails to disclose teach or even suggest at least the features of: 1) establishing a predetermined set of regular expressions, each regular expression of said predetermined set of regular expressions corresponding to a specific parts-of-speech (POS) tag sequence; 2) inputting and parsing said text document to provide a plurality of POS tag sequences; 3) matching said predetermined set of regular expressions to said plurality of POS tag sequences from said text

document to provide one or more extracted opinions; and 4) lexically analyzing each word of said one or more extracted opinions to group said one or more extracted opinions into clusters of extracted opinions, as recited in independent claim 1 and similarly recited in independent claim 10 and 33.

[0005] As previously noted in Applicants' prior responses, which are hereby re-stated and incorporated by reference, Subasic is silent concerning regular expressions. The Communication ignores Applicants' definition of the term "regular expression" provided at, for example, para. 23, ll. 6-9 of the Applicants Specification as published. Instead, the Communication asserts that:

*"[s]ince the term "expression" is relatively well-known in the English language, it is reasonable to interpret the term "expression" as an indication of felling, spirit, character, etc. (definition of "expression" according to [www.dictionary.com](http://www.dictionary.com)). And individual POS word, phase, and sentence all have expressions ([www.dictionary.com](http://www.dictionary.com)). For example, the term "alert" indicates a kind of intelligence and/or a kind of warning (col. 3, lines 61-65). They are expression values of the term." (Communication, p. 2, para. 1)*

[0006] Applicants respectfully submit that it is simply improper for the Communication to fail to afford patentable weight to clear and unambiguous terms recited in the claims.

Moreover, although Applicants are entitled to be their own lexicographer, no such latitude is provided to the Office. Applicants note that paragraph 9, ll. 3-5 of Applicants' Specification as filed also provides a definition for the term "opinions". The Communication simply omits any explanation as to how "regular" reasonably modifies the term "expression" in the Communication's asserted construction. However, the Communication's reliance on alternate

*possible* meanings for terms is irrelevant since the Applicants have already unambiguously defined what is meant by the terms recited in the claims.

[0007] Thus, claims 1, 10 and 33 define patentable subject matter over Subasic. Claims 2-3, 6-9, 11-13, 16-19, 29-30, 34-35 and 37-40 depend from claims 1, 10 and 33 and therefore define patentable subject matter for at least the same reasons. Applicants therefore request the withdrawal of the 35 U.S.C. § 102(e) rejection of claims 1-3, 6-10, 12-13, 16-19, 29-30, 33-35 and 37-40.

[0008] Applicants can discern no indication of regular expressions in the cited portions of Chase which merely describes methods of connotative discourse analysis (see for example, Chase, Abstract). Thus, the asserted combination of Subasic with Chase fails to remedy at least the noted deficiencies of Subasic. The rejection of dependent claims 31 and 41-42 is therefore improper. Applicant therefore respectfully requests withdrawal of the 35 U.S.C. § 103(a) rejection of claims 31 and 41-42 and prompt allowance.

[0009] The claimed invention, as provided in amended independent claims 1, 10, and 33 contain features, which are patentably distinguishable from the prior art references of record.

[0010] Moreover, the Applicants note that all claims are properly supported in the specification and accompanying drawings, and no new matter is being added. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the rejections.

## **II. Formal Matters and Conclusion**

[0011] Claims 1-3, 6-10, 12-13, 16-19, 29-35, and 37-42 are pending in the application.

[0012] Entry of this paper is proper because the arguments will either place the application in condition for allowance or in better form for appeal. Applicant further respectfully submits that no new matter is added to the previously amended claims, nor has the scope of the pending claims changed. Accordingly, no new issues are raised that necessitate a further search of art. Applicant respectfully traverses the rejections based on the following discussion.

[0013] With respect to the rejections of the claims over the cited prior art, Applicants respectfully submit that the present claims are distinguishable over the prior art of record. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the rejections to the claims.

[0014] In view of the foregoing, Applicants submit that claims 1-3, 6-10, 12-13, 16-19, 29-35, and 37-42, all the claims presently pending in the application, are patentably distinct from the prior art of records and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest time possible.

[0015] Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary.

[0016] Please charge any deficiencies and credit any overpayments to Attorney's Deposit  
Account Number 09-0441.

Respectfully submitted,

Dated: December 10, 2008

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